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Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION

ADRAIN ORTIZ and
HEATHER ORTIZ

Debtor.

CASE NO. 19-13660

Chapter 13

NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE

Michael J. McCrystal, Attorney for the Movant, has filed an Motion to Avoid the Judicial Lien of Juan Turull.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (if you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in this motion or if you want the Court to consider your views on this Motion, then on or before September 4, 2019, you or your attorney must do **all** of the following
 - (A) file an answer explaining your position at:

Clerk, United States Bankruptcy Court for
The Eastern District of Pennsylvania
400 Washington Street, Third Floor
The Madison Building
Reading, PA 19601

If you mail your answer to the Clerk's Office for filing, you must mail early enough so that it will be received on or before the date stated above

(B) Mail a copy to the Movant's Attorney:

Michael J. McCrystal, Esquire
151 Main Street, STE A
Emmaus, PA 18049
(610) 262-7873
(610) 262-2219 (facsimile)

(C) Mail a copy to :

Office of the United States Trustee	Scott Waterman, Esquire
833 Chestnut Street	2901 St. Lawrence Avenue
Suite 500	PO Box 4010
Philadelphia, PA 19107	Reading, PA 19606

2. If you or your attorney do not take the steps described in 1(A) and 1(B) above and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
3. A hearing on the Motion is scheduled before the Honorable Eric L. Frank on September 12, 2019 at 11:00 AM in Courtroom number 1, United States Bankruptcy Court for the Eastern District of Pennsylvania, 400 Washington Street, The Madison Building, Reading, PA 19606-4010
4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you, if you request a copy from the attorney named in paragraph 1(B).
5. You may contact the Bankruptcy Court Clerk's Office at 610 208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

/s/ Michael J. McCrystal
Michael J. McCrystal, Esquire